



November 29, 2021

Ms. Caroline Freeman  
Air Planning & Implementation Branch  
U.S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street SW  
Atlanta, GA 30303-8909

**Re: Pre-Hearing Draft Regional Haze State Implementation Plan (SIP) for South Carolina Class I Federal Areas for Second Planning Period (2019 – 2028)**

Dear Ms. Freeman:

I am pleased to submit the pre-hearing draft of the Regional Haze State Implementation Plan (SIP) for South Carolina Class I Areas for the Second Planning Period (2019 – 2028). This prehearing draft SIP was prepared in accordance with the Federal Regional Haze Rule (RHR) provisions specified in 40 CFR 51.308(f) and the U.S. Environmental Protection Agency's (EPA) guidance for implementing the rule to comply with Section 169 of the Clean Air Act, as amended in 1990. This SIP also contains the second five-year progress report covering the period 2010 through 2018 as required in 40 CFR 51.308(g) (1) through (5) of the RHR.

The pre-hearing draft SIP represents commitments and enforceable actions taken by the South Carolina Department of Health and Environmental Control (Department), Bureau of Air Quality (BAQ) to address the requirements of the RHR during the second implementation period from 2019 to 2028, towards the goal of attaining natural visibility conditions in South Carolina's mandatory Federal Class I area and those mandatory Federal Class I areas in other states that may be affected by emissions from South Carolina. Pursuant to 40 CFR 51.308(f), South Carolina's prehearing draft SIP includes the following elements:

- Calculations of baseline, current, and natural visibility conditions; progress to date; and the uniform rate of progress for each Class I area;
- Documentation of the technical analysis on which South Carolina is relying to determine reasonable progress, including modeling, emissions, and data analysis;

- Source-specific reasonable progress assessment/four-factor analyses and documentation of the source selection process;
- Long-term strategy for regional haze resulting from the reasonable progress analyses;
- Reasonable progress goals;
- Monitoring strategy and other implementation plan requirements; and
- Documentation of consultation with other states, EPA, and Federal Land Managers (FLMs ).

In Section 7.9 of the pre-hearing draft, the Department is proposing to incorporate into the regulatory portion of South Carolina's SIP at 40 CFR 52.2120, table (d), certain source-specific SO<sub>2</sub> emission limits and associated monitoring, recordkeeping, and reporting requirements resulting from the reasonable progress assessment/four-factor analyses for International Paper Georgetown Mill, WestRock Charleston Kraft, LLC, Century Aluminum of South Carolina, Inc., Santee Cooper Cross Generating Station, and Santee Cooper Winyah Generating Station. The source-specific SO<sub>2</sub> emission limits and associated requirements are based on the requirements in respective permits or proposed permit conditions. While not requesting that the EPA include the entire copy of each permit in the pre-hearing draft SIP, a copy of available permits is included in Appendix G. Once issued, the remaining permits will be sent to the EPA as a supplementary package.

The pre-hearing draft SIP also includes Appendices A through H. Appendices A through E include technical support materials and documentation used in developing the SIP. Appendix F includes the documentation of the interagency consultation process. Appendix G includes documentation of the source-specific reasonable progress assessment/four-factor analyses conducted. Appendix H documents the 60-day FLM consultation process and includes comments provided by the FLMs. The pre-hearing draft SIP includes the full Table of Appendices that provides descriptions and file names for each appendix and sub-appendix and indicates which are South Carolina-specific and which are related to work completed through the Visibility Improvement – State and Tribal Association of the Southeast (VISTAS) regional planning organization. The South Carolina-specific appendices are:

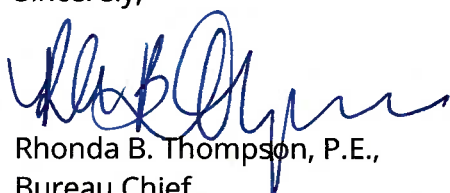
- Appendix F-1: South Carolina Consultation Letters to VISTAS States
- Appendix F-4: South Carolina Consultation with Mid-Atlantic/Northeast Visibility Union (MANE-VU)
- Appendix F-5: South Carolina Environmental Justice Initiative
- Appendix G-1: Department Letters to Facilities

- Appendix G-2: Responses from Facilities
- Appendix G-3: Facility Permits
- Appendix G-4: South Carolina Certified Smoke Management Plan
- Appendix H: Hearing Report, Comments Received, and Responses

On November 26, 2021, the Department published a Notice of General Public Interest in the *South Carolina State Register*, in accordance with 40 CFR 51.102, notifying the public that the pre-hearing draft of the Regional Haze SIP for South Carolina Class I Areas for the Second Planning Period (2019 – 2028), is available for public comment and is also posted on the Department website for review at <https://scdhec.gov/RegionalHazePlan>. The public comment period is open from Friday, November 26, 2021, through Wednesday, January 5, 2022. A public hearing will be held on Wednesday, January 5, 2022, at 6:00 pm EDT. In order to address current guidance to help minimize the spread of COVID-19, the public hearing will be held virtually via Microsoft Teams. In addition to posting on the website, the Department is sending the public notice announcement to interested stakeholders from industry and environmental groups via Department email list. The Department intends to submit a final version of this pre-hearing draft for incorporation into South Carolina's SIP through EPA's SPeCS web-based system after considering relevant public comments.

The Department appreciates the assistance provided by EPA Region 4 staff regarding the formulation of this plan. Should you have any questions regarding this pre-hearing submittal, please contact Heinz Kaiser of my staff at (803) 898-4089 or by email at [kaiserh@dhec.sc.gov](mailto:kaiserh@dhec.sc.gov).

Sincerely,



Rhonda B. Thompson, P.E.,  
Bureau Chief,  
Bureau of Air Quality

cc: Lynorae Benjamin Air Regulatory Management Section, EPA Region 4  
Michele Notarianni, Air Regulatory Management Section, EPA Region 4  
Pepa Sassin, Air Regulatory Management Section, EPA Region 4  
Evan Adams, Air Regulatory Management Section, EPA Region 4  
R. Keith Frost, Assistant Bureau Chief, BAQ  
Heinz Kaiser, Division of Emissions Evaluation and Support, BAQ  
Mary Peyton D. Wall, Air Regulation and SIP Management Section, BAQ